

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

JESSICA JONES, et al.,

Plaintiffs,

v.

VARSITY BRANDS, LLC, et al.

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

JURY DEMAND

**DECLARATION OF KEVIN E. RAYHILL IN SUPPORT OF PLAINTIFFS'
SUPPLEMENTAL MOTION TO UNSEAL FILINGS PREVIOUSLY FILED UNDER
SEAL**

DECLARATION OF KEVIN E. RAYHILL

I, Kevin E. Rayhill, declare the following under penalty of perjury:

1. I am an attorney at the Joseph Saveri Law Firm, LLP, counsel for Plaintiffs Jessica Jones and Christina Lorenzen (collectively, “Plaintiffs”), in *Jones v. Bain Capital Private Equity*, case no. 2:20-cv-02892-SHL-tmp (“Jones Action”). I am a member in good standing of the State Bar of California and have been admitted *pro hac vice* in the United States District Court for the Western District of Tennessee, Western Division. I am over 18 years of age and have personal knowledge of the facts stated in this Declaration. If called as a witness, I could and would testify competently to them. I write this declaration in support of Plaintiffs’ Supplemental Motion to Unseal Filings Previously Filed Under Seal (“Motion”).

2. Beginning on December 6, 2023, I met and conferred with counsel for the Direct Purchaser Plaintiffs in the related case *Fusion Elite All Stars v. Varsity Brands, LLC*, case no. 2:20-cv-02600-SHL-tmp, concerning whether they would object to unsealing certain documents and information designated as confidential by the Fusion Elite Plaintiffs in their case, and subsequently filed in this case. Counsel for the Fusion Elite Plaintiffs agreed to unseal some of the materials they had previously designated as confidential but continued to assert confidentiality over certain specified materials.

3. During our meet and confers, it was made clear to me which materials the Fusion Elite Plaintiffs wished to keep confidential, and which materials they agreed to unseal.

4. We have shared with Defendants which materials the Fusion Elite Plaintiffs continue to assert confidentiality over.

I declare under penalty of perjury that the foregoing is true and correct. Executed on
March 19, 2024 in San Francisco, California.

/s/ Kevin E. Rayhill

Kevin E. Rayhill